

United States District Court

FOR THE
NORTHERN DISTRICT OF CALIFORNIA

VENUE: SAN FRANCISCO

FILED
DEC 15 2015
SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

V.

[REDACTED]

ADAM SHAFI,

CR 15 0582

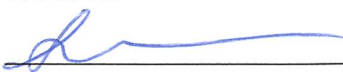
DEFENDANT(S).

INDICTMENT

WHO

Title 18 U.S.C. § 2339B(a)(1) – Providing material support or resources to
designated foreign terrorist organizations

A true bill.



Foreman

Filed in open court this 15th day of

December, 2015



Clerk

Bail, \$ no process

Adrian

15dx

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN [REDACTED] COURT

BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING

OFFENSE CHARGED

Title 18 U.S.C., Section 2339B(a)(1) - Providing material support or resources to designated foreign terrorist organizations

☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony

PENALTY: Maximum Prison Term of 20 Years;
 Maximum Fine of \$250,000;
 Maximum Term of Supervised Release of 3 years; and
 Mandatory Special Assessment of \$100.

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

DEFENDANT - U.S.

ADAM SHAFI

DISTRICT COURT NUMBER

CR 15 0582 WHO

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

Federal Bureau of Investigation

☐ person is awaiting trial in another Federal or State Court, give name of court

☐ this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:

☐ U.S. ATTORNEY ☐ DEFENSE

SHOW DOCKET NO.

☐ this prosecution relates to a pending case involving this same defendant

MAGISTRATE CASE NO.

☒ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

15-70856 MAG

Name and Office of Person

Furnishing Information on this form BRIAN J. STRETCH

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned)

Candace Kelly

DEFENDANT

IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.

1) ☐ If not detained give date any prior summons was served on above charges

2) ☐ Is a Fugitive

3) ☐ Is on Bail or Release from (show District)

IS IN CUSTODY

4) ☒ On this charge

5) ☐ On another conviction

☐ Federal ☐ State

6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

DATE OF ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS

PROCESS:

☐ SUMMONS ☒ NO PROCESS* ☐ WARRANT

Bail Amount: no bail

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: Before Judge:

Comments:

BRIAN J. STRETCH (CABN 163973)
Acting United States Attorney

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CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

CR 15 0582

UNITED STATES OF AMERICA,

Plaintiff,

v.

ADAM SHAFI,

Defendant.

-) No.

) VIOLATION:

) Title 18, United States Code, Section 2339B(a)(1) –
) Providing material support or resources to designated
) foreign terrorist organizations

) SAN FRANCISCO VENUE

WHO

INDICTMENT

The Grand Jury charges:

1. At all times relevant to this Indictment, al-Nusrah Front was a designated Foreign Terrorist Organization (“FTO”). Specifically:

- a. On October 15, 2004, the United States Secretary of State designated al-Qa’ida in Iraq (“AQI”), then known as Jam’at al Tawhid wa’al-Jihad, as an FTO under Section 219 of the Immigration and Nationality Act and as a Specially Designated Global Terrorist entity under section 1(b) of Executive Order 13224.

- b. On December 11, 2012, the Secretary of State amended the designation of AQI to include the following aliases: al-Nusrah Front, Jabhat al-Nusrah, Jabhet al-Nusra, The Victory Front, and Al-Nusrah Front for the People of the Levant.
- c. On May 15, 2014, the Secretary of State, in response to the evolving nature of the relationships between al-Nusrah Front and AQI, amended the FTO designation of AQI to remove all aliases associated with al-Nusrah Front. Separately, the Secretary of State then designated al-Nusrah Front, also known as Jabhat al-Nusrah, also known as Jabhet al-Nusra, also known as The Victory Front, also known as Al-Nusrah Front for the People of the Levant, also known as Al-Nusrah Front in Lebanon, also known as Support Front for the People of the Levant, and also known as Jabaht al-Nusra li-Ahl al-Sham min Mujahedi al-Sham fi Sahat al-Jihad, as an FTO under Section 219 of the Immigration and Nationality Act and as a Specially Designated Global Terrorist entity under section 1(b) of Executive Order 13224.

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2. Beginning on a date unknown, but no later than June 2015, through on or about June 30, 2015, in the Northern District of California, the defendant,

ADAM SHAFI,

knowingly attempted to provide material support and resources, specifically, personnel, to a foreign terrorist organization, namely, al-Nusrah Front, knowing that it was a designated foreign terrorist organization and that the organization had engaged and was engaging in terrorist activity and terrorism, in violation of Title 18, United States Code, Section 2339B(a)(1).


DATED:

A TRUE BILL.

12/15/15


FOREPERSON

BRIAN J. STRETCH
Acting United States Attorney


PHILIP A. GUENTERT
Deputy Chief, Criminal Division

(Approved as to form: )
CANDACE KELLY
Assistant United States Attorney